

## RCRA INSPECTION REPORT

### I. GENERAL INFORMATION:

Facility Name: File: G-02-02-004  
Jard Company Incorporated  
Bowen Road  
Bennington, VT 05201  
(802) 442-3173

Company Officials Interviewed:

Manny Segura - Bank Trustee for Jard

EPA/State Officials Conducting the Inspection:

Kenneth Rota, VT DEC

Type of Inspection: Initial

Date of Inspection: September 20, 1989

Last Inspection Date: January 19, 1987

### II. RCRA REPORTING/INFORMATION REQUIREMENTS:

Facility EPA ID Number: VTD048141741

Type of Operation: Capacitor Manufacturer

Notification Date: September 27, 1981

Source Classification: Generator (>1000 kg/month)

### III. SOURCE DESCRIPTION:

Jard Company Inc. is a manufacturer of oil-filled capacitors and small control transformers. The company was established in 1969 as a manufacturer of small capacitors (containing approximately 75 lbs of dielectric fluid), small non-fluid transformers (up to 75 KVA) and small motors (using up to 200 watts).

The manufacture of the oil-filled capacitors first involves foil winding. The windings are housed in metal sleeves and are sent to an oil impregnation line. This operation fills the capacitor with non-pcb dielectric fluids (DOP). After the oil impregnation, the capacitors are degreased, tested and painted.

The transformer operation involves winding the units, assembly of each unit, varnishing and testing.

The manufacturing process generates waste Dioctylnonyl-phthalate (DOP), waste hydraulic and lubricating oils, waste paint

and varnish, waste methylene chloride from varnish removal, waste trichloroethylene, waste 1,1,1 trichloroethane and reject capacitors containing DOP.

#### IV. GENERAL OBSERVATIONS:

I arrived on-site unannounced and observed a vehicle with New York plates parked in front of the office. I knocked on the door and rang the doorbell but was unable to get any response. I stopped at the site in response to a conversation with Scott Meyer of VOSHA and Charles Watson, formerly of Jard. Both these individuals called to inform me that Jard had closed and was currently in Chapter 11 Bankruptcy. Mr. Watson called to tell me that he was now working for Sprague Electric Company of North Adams, Massachusetts. Both men indicated that hazardous wastes were still on-site and Mr. Watson called to further state that he was layed off and that he no longer had responsibility over the hazardous waste issues at the property.

I walked around the property and looked into the office windows for any individuals that might be on-site and I rang all doorbells and tried all doors to see if the building was secure.

Along the side of the building, I observed what appeared to be a concrete tank and around the tank was a grayish sludge that appeared to have been caused by an overflow of the tank. The sludge looked like waste paint that I have observed at the facility. The sludge, however, also had a smell of DOP.

Further down along this side of the building was a fenced in storage area. The area was locked and a "windshield" survey of the enclosure revealed hazardous waste drums in storage. There were 7 fiber drums containing wastes, 15 fifty-five gallon drums and 1 ~thirty gallon drum (marked corrosive). The front side of the enclosure had ~35 fifty-five gallon drums and ~30-40 assorted sized containers up to ten gallons in volume. Containers could be seen with masking tape or other writing indicating the material was dirty or contaminated. The various hazardous materials seen included oil, methyl alcohol, toluene, trichloroethylene, hydrochloric acid, asbestos roof coating, paint enamel, methanol, acetone and plastic remover.

A walk around the back side of the building found two uncovered fiber drums containing zinc dust and one drum that was filling with zinc dust under the dust collector before the shutdown. A two thousand gallon tank was adjacent to the fiber drums and was full. I could not access the liquid and determine the nature of the waste. A hazardous waste label with no writing (perhaps the writing faded) was affixed to the tank. Zinc dust was seen on the ground and around the tank. The tank was above ground on supports with no secondary containment.

The area also had various pipes and concrete boxes that could not be identified as to their purpose or function. Mr. Watson indicated that the process discharges into an on-site

leachfield. Dick Rollins, president of Jard has apparently disputed the existence of the leachfield. The existence of concrete boxes on the back side of the building appears to be a leachfield type arrangement. A manhole marked "sewer" is also located near the back of the building. The building on this side also has piping that emanates from the building to the outside area. It is not clear if anything is discharged through the pipes.

Along the opposite side of the building, parallel to the side with the fenced enclosure is a small caged area. This area was found to have two fifty-five gallon drums containing a "Dimethyl.....". The labels were positioned such that I could not read them.

My outside inspection brought me completely around the building to the front office area. This time, two vehicles with New York license were observed in the parking lot. I peered through the window and observed two men inside the office. I knocked on the door and managed to get their attention.

I indentified myself to the gentleman opening the door and explained that I was at the plant in response to the bankruptcy problems and hearsay concerning waste left on-site. The person identified himself as Manny Segura. Mr. Segura was a former Jard employee that had recently obtained a job with the bank to oversee the bank's interests. The bank apparently owns the equipment at Jard.

Mr. Segura led me to an inside waste storage area. The area was packed tight with 138 fifty-five gallon drums of various hazardous wastes to be shipped out by C.M. Laboratories. I also observed ~21 cubic yards of reject capacitors that were leaking through their cardboard containers. The reject capacitors were not part of the shipment nor were the wastes observed in the tank and the outside storage areas.

The financial situation with Jard is at the reorganization stages within the bankruptcy courts and a trustee named Laurence Levy (804-644-2000) was appointed the previous week by the court to mangle the assets of the company.

Mr. Segura could not help me with respect to what the types of wastes might be that remained on-site. He was not a technical person when employed by the company. I concluded my inspection at that point.

#### V. DOCUMENT REVIEW:

No documents were available for review. The company was shutdown and may never reopen. No one is monitoring the hazardous waste remaining on-site other than the removal bid of the 138 drums inside the building.

#### VI. ISSUES TO BE ADDRESSED:

The company is questionable for resuming operations. The main priority for this situation is to ensure the removal of the remaining hazardous waste. The presence of various releases must be addressed either through the sites program or the closure provisions of the RCRA regulations. The Agency should file as a creditor to access any monies that may be distributed in the event of a Chapter 7 liquidation. If no filing is made, we may be locked out of funds for evaluating the site.

Currently, the company trustee is pursuing a site assessment and cleanup of any potential contamination. Mr. Levy indicated that he wanted to be able to sell the property without any problems. Because of this action, the potential for liquidation seems a strong possibility.

2 53 gal drums

dimethyla . . . . . fenced area near back

2 <sup>uncovered</sup> fiber containers zinc

1 fiber container under cyclone.

1 tank - appears full from stand pipe

zinc on ground

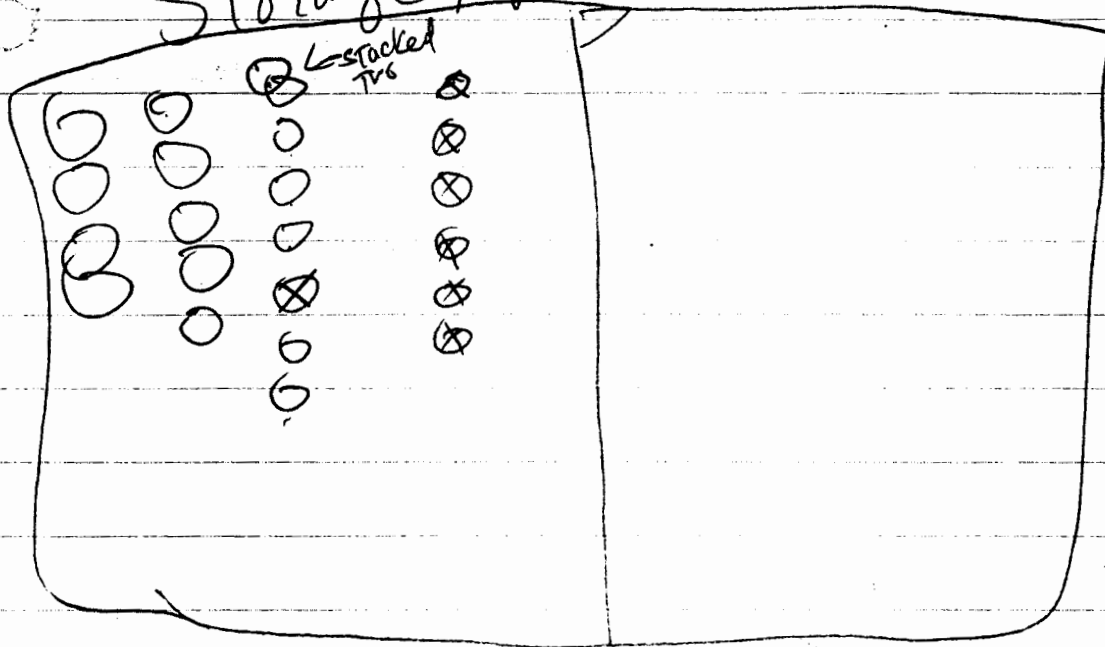
+ 138 drums in building

+ ~ 21 yd<sup>3</sup> reject capacitors

Lawrence Levy - Trustee  
804-644-2000

Manny Segura -

## Storage Diagram



7 Fiber drums <  
 15 55 gallon  
 1 ~30 gallon corrosive label

oil

methyl alcohol

Falrene

trichloroethylene

Hydrochloric Acid

13 Books, w/ of coating

Paint Enamel

Methanol

Pectone

Plastic scum

~ 35 55 gallon steel  
 ~ 30-40 5, 10 gal assorted other size

